

**STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E**

IN RE: )  
)  
Friends of the Earth and Sierra Club, )  
Complainant / Petitioner v. South Carolina )  
Electric & Gas Company, )  
Defendant/Respondent )

IN RE: ) **SOUTH CAROLINA COASTAL**  
) **CONSERVATION LEAGUE AND**  
Request of the South Carolina Office of ) **SOUTHERN ALLIANCE FOR**  
Regulatory Staff for Rate Relief to SCE&G ) **CLEAN ENERGY'S SECOND SET**  
Rates Pursuant to S.C. Code Ann. § 58-27- ) **OF WRITTEN INTERROGATORIES**  
920 ) **AND REQUEST FOR PRODUCTION**  
 ) **OF DOCUMENTS AND THINGS**

IN RE: )  
)  
Joint Application and Petition of South )  
Carolina Electric & Gas Company and )  
Dominion Energy, Incorporated for Review )  
and Approval of a Proposed Business )  
Combination between SCANA Corporation )  
and Dominion Energy, Incorporated, as May )  
Be Required, and for a Prudency )  
Determination Regarding the Abandonment )  
of the V.C. Summer Units 2 & 3 Project and )  
Associated Customer Benefits and Cost )  
Recovery Plan )

**TO: K. CHAD BURGESS, ESQ., AND MATTHEW W. GISSENDANNER, ESQ.,  
REPRESENTATIVES FOR SOUTH CAROLINA ELECTRIC & GAS  
COMPANY:**

The South Carolina Coastal Conservation League (“CCL”) and the Southern Alliance for Clean Energy (“SACE”), as intervenors and parties of record in the above-captioned actions, request, pursuant to South Carolina Public Service Commission Rule 103-833.B, that South Carolina Electric & Gas Company (“SCE&G”) and Dominion

Energy, Inc. (“Dominion”) respond to the following Requests for Production under oath and to serve the responses to these requests within twenty (20) days.

### **DEFINITIONS AND INSTRUCTIONS**

1. “You” and “your” includes SCE&G and Dominion and any of SCE&G or Dominion’s representatives, owners, employees, members, attorneys, or agents.

2. “Document” and “workpaper” shall have the broadest possible meaning and shall include the original and any non-identical copy (whether different from the original because of handwritten notes, underlining, or other marks,) regardless of origin or location, of written, typed, printed, or graphic matter (however produced or reproduced), and electrical or magnetic sound or video recordings, or transcriptions thereof, file or photographic prints, and all other writings or recordings of every kind and description, including, but not limited to, papers, letters, correspondence, agreements, contracts, telegrams, notes, notations, computer printouts, digital or e-mail communications, text messaging, data sheets, data processing cards or tapes, memoranda (including memoranda or memorials of conversations or meetings), intra-office communications, notebooks, reports, articles, books, pamphlets, periodicals, tables, charts, graphs, blueprints, drawings, studies, worksheets, estimating sheets, bids, bills, time cards, indices, lists, surveys, diaries, diary entries, facsimiles, specimens, models, schedules, accounts, invoices, purchase orders, estimates, ledgers, audits, and indices, and drafts, revisions or amendments of any of the above, and generally, any kind of tangible, permanent records that are now, or formerly were, in your possession, custody or control, or that were known by you to exist, and that can be located or discovered by reasonably diligent efforts.

3. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, on a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.

4. If any privilege is claimed with respect to any requested item, the identification of which would otherwise be required by these requests, with respect to each document and oral communication for which a privilege is claimed, you shall:

- a) identify the date thereof;
- b) state the particular privilege believed applicable and concisely state sufficient facts to support the claim of privilege; and
- c) if the privilege is asserted with respect to a document, identify all persons to whom its contents were disclosed, including all recipients thereof.

### **REQUESTS**

1. Please provide any documents and workpapers related to any studies or analyses of purchasing the Columbia Energy Center or any other generating resource, as an alternative to purchasing capacity contracts or for any other reason, while V.C. Summer units 2 and 3 were under construction, or since the V.C. Summer new nuclear project was abandoned.

2. Please provide any cost-benefit study or analysis the Company undertook to select the option to purchase the Columbia Energy Center.

3. Please provide a comparison of the impacts to ratebase associated with the cost mitigation provisions described in each of the three scenarios presented in the Joint

Merger Application filed in Docket No. 2017-370-E, specifically, the “Customer Benefits Plan” (as described at pp. 23-29, 41-48 of the merger application), the “No Merger Benefits Plan” described in Exhibit 10, and the “Base Request” described in Exhibit 11. If a comparison is not available, please provide any documents and workpapers related to any studies or analyses of the impacts to ratebase of any of the three plans.

4. Please reconcile the impacts described in the sections referred to in pp.23-29, 41-48 of the merger application, Exhibit 10, and Exhibit 11 of the Application with the calculation of deferred debits / credits for each of the three scenarios described in lines 7-14 on p.9 of Exhibit 14, p.9 of Exhibit 15, and p.9 of Exhibit 16. That is, please show how the customer mitigation provisions (and other ratebase impacts) of each scenario results in the net “deferred debts / credits – electric” shown in lines 7-14 on p.9 of Exhibit 14, p.9 of Exhibit 15, and p.9 of Exhibit 16.

5. Please provide a detailed accounting of how the net proceeds from the Toshiba payment impact rate base in each of the three plans—the “Customer Benefits Plan,” the “No Merger Benefits Plan,” and the “Base Request”.

6. Please provide a detailed accounting of how the \$1.2 billion in V.C. Summer Units 2 & 3 Project costs yet to be approved by the South Carolina Public Service Commission are accounted for in lines 7-14 on p.9 of Exhibit 14, p.9 of Exhibit 15, and p.9 of Exhibit 16.

7. Please provide an accounting of any challenges the company may face in pre-paying any of its outstanding long-term debt obligations. Please provide an assessment of the long-term debt obligations that the company would chose to pre-pay if a very low-cost debt refinancing opportunity (i.e., with long-term AAA debt) were to

arise, or any challenges the company may face in paying off long-term debt obligations through very-low cost debt refinancing.

These Requests shall be deemed to continue from the time of service until the time of final disposition of this matter by the Commission so that information sought, which comes to the knowledge of a party, or its attorney, after original Responses to these Requests have been submitted, shall be promptly supplemented.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "William C. Cleveland".

William C. Cleveland (SC Bar No. 79051)  
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August 20, 2018

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Recovery Plan )

I certify that the following persons have been served with a copy of the Second Set of Written Interrogatories and Request for Production of Documents and Things by the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy, by electronic mail, at the addresses set forth below:

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This the 20<sup>th</sup> day of August, 2018.

s/ A. Rachel Pruzin